

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all
other similarly situated persons,

Plaintiffs,

v.

HENRY D. MCMASTER, in his official
capacity as Governor of South Carolina;
THOMAS C. ALEXANDER, in his official
capacity as President of the Senate; LUKE A.
RANKIN, in his official capacity as Chairman
of the Senate Judiciary Committee; JAMES H.
LUCAS, in his official capacity as Speaker of
the House of Representatives; CHRIS
MURPHY, in his official capacity as Chairman
of the House of Representatives Judiciary
Committee; WALLACE H. JORDAN, in his
official capacity as Chairman of the House of
Representatives Elections Law Subcommittee;
HOWARD KNAPP, in his official capacity as
interim Executive Director of the South
Carolina State Election Commission; JOHN
WELLS, Chair, JOANNE DAY, CLIFFORD
J. EDLER, LINDA MCCALL, and SCOTT
MOSELEY, in their official capacities as
members of the South Carolina Election
Commission,

Defendants.

Civil Action No. 3:21-cv-03302-JMC-TJH-
RMG

JOINT STIPULATION

WHEREAS Plaintiffs, The South Carolina State Conference of the NAACP and Taiwan Scott, on behalf of himself and all other similarly situated persons, and all Defendants above named, by and through their undersigned counsel, hereby desire to enter into this stipulation

concerning the applicability of certain portions of the Local Civil Rules regarding depositions in the District of South Carolina;

WHEREAS Plaintiffs and all Defendants above named may be collectively referred to herein as the “**Parties**”;

WHEREAS the above-captioned case, Civil Action No. 3:21-cv-03302-JMC-TJH-RMG, may be referred to herein as the “**Action**”; and

WHEREAS the Parties met and conferred and reached an agreement regarding the operation of the Local Civil Rules (D.S.C.), for the purposes of avoiding unnecessary disputes that could arise throughout the course of depositions in this Action due to its streamlined nature.

NOW, THEREFORE, IT IS on this 2nd day of February, 2022, STIPULATED as follows:

1. The Parties agree that each side may take no more than fifteen (15) depositions, including expert witness depositions. The Parties have agreed that, generally, all reasonable efforts will be made to limit the duration of each deposition to five (5) hours.

2. Given the ongoing nature of the COVID-19 pandemic and the fact that some witnesses reside outside of South Carolina, the Parties agree that depositions in this Action may be taken remotely via Zoom, Webex, or another reliable and agreed-upon electronic means. This does not prevent the Parties from taking live, in-person depositions in this Action. The Parties agree to work cooperatively regarding the scheduling and taking of depositions on a witness-by-witness basis.

3. The Parties agree that Local Civil Rule 30.02, regarding objections to telephonic depositions, does not apply to this Action.

4. The Parties agree that the seven (7) day timeframe within Local Civil Rule 30.04(C) shall be reduced to (3) days.

5. The Parties agree that the “at least seven (7) days” timeframe within Local Civil Rule 30.04(H) shall be reduced to at least two (2) days. Furthermore, the Parties agree that Local Civil Rule 30.04(H) does not apply to expert witnesses and, therefore, deposing counsel need not provide to opposing counsel a copy of any documents to be shown to an expert witness during the expert witness’s deposition.

6. The Parties may modify this Joint Stipulation, provided, however, that any modification shall not be effective unless it appears in a writing signed by all Parties.

Respectfully submitted,

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